

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

X
_____)
IN THE MATTER OF THE)
SIDNEY LANDFILL SUPERFUND SITE)
)
Ellinwood Auto Parts, Inc.;)
A & P Disposal Service, Inc.;)
Keith Clark (a Division of Cullman)
Ventures, Inc.),)
)
Respondents)
)
Proceeding under Section 122(g)(4))
of the Comprehensive Environmental)
Response, Compensation, and)
Liability Act of 1980, as amended,)
42 U.S.C. § 9622(g)(4).)
_____) X

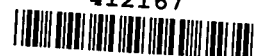
ADMINISTRATIVE ORDER
ON CONSENT

Index No.
II CERCLA-95-0215

I. JURISDICTION

1. This Administrative Order on Consent ("Consent Order") is issued pursuant to the authority vested in the President of the United States by Section 122(g)(4) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9622(g)(4), to reach settlements in actions under Section 106 or 107(a) of CERCLA, 42 U.S.C. § 9606 or § 9607(a). The authority vested in the President has been delegated to the Administrator of the United States Environmental Protection Agency ("EPA") by Executive Order 12580, 52 Fed. Reg. 2923 (Jan. 29, 1987), and further delegated to the Regional Administrators of EPA by EPA Delegation No. 14-14-E (issued Sept. 13, 1987, amended by memoranda dated June 17, 1988 and May 19, 1995).

412167



2. This Consent Order is issued to Keith Clark (a Division of Cullman Ventures, Inc.) ("Keith Clark"); Ellinwood Auto Parts, Inc. ("Ellinwood"); and A & P Disposal Service, Inc. ("A & P") (hereinafter collectively referred to as the "Respondents"). This Consent Order concerns the contribution of the Respondents toward the costs of the response actions that have been and will be conducted in connection with the Sidney Landfill Site (the "Site"), located in the Towns of Masonville and Sidney, Delaware County, New York.

3. Each Respondent agrees to undertake all actions required by the terms and conditions of this Consent Order. This Consent Order was negotiated and executed by EPA and Respondents in good faith to avoid the expense and delay of litigation over the matters addressed by this Consent Order. Each Respondent further consents to and will not contest EPA's jurisdiction to issue this Consent Order or to implement or enforce its terms.

4. Respondents are entering into this Consent Order without admitting EPA's Findings of Fact or Determinations as set forth in Sections IV, V, and Appendix 2, below, or admitting any other facts or any liability for any purpose as to any matter arising out of the transactions or occurrences alleged in this Consent Order; nor do they acknowledge that the release or threatened release at or from the Site constitutes an imminent or substantial endangerment to the public health or welfare or the environment.

II. PARTIES BOUND

5. This Consent Order shall apply to and be binding upon EPA and upon each Respondent and its successors. Each signatory to this Consent Order represents that he or she is fully authorized to enter into the terms and conditions of this Consent Order and to fully and legally bind the party represented by him or her. Any change in ownership or corporate status of a Respondent, including any transfer of assets or real or personal property, shall in no way alter such Respondent's payment responsibilities under this Consent Order.

III. DEFINITIONS

6. Unless otherwise expressly provided herein, terms used in this Consent Order that are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in the statute or regulations. Whenever the terms listed below are used in this Consent Order, including the attached appendices, the following definitions shall apply:

a. "CERCLA" shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §§ 9601-9675.

b. "Consent Order" shall mean this Administrative Order on Consent and all appendices attached thereto. In the event of a conflict between this Consent Order and any appendix, this Consent Order shall control.

c. "Day" shall mean a calendar day. In computing any period of time under this Consent Order, where the last day would fall on a Saturday or Sunday, or a Federal holiday, the period shall run until the close of business of the next working day.

d. "EPA" shall mean the United States Environmental Protection Agency and any successor departments or agencies of the United States.

e. "National Contingency Plan" or "NCP" shall mean the National Oil and Hazardous Substances Pollution Contingency Plan promulgated pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, codified at 40 C.F.R. Part 300, including any amendments thereto.

f. "Paragraph" shall mean a portion of this Consent Order identified by an Arabic numeral or a lower case letter.

g. "Parties" shall mean the United States and Respondents.

h. "Respondents" shall mean Ellinwood Auto Parts, Inc.; A & P Disposal Service, Inc.; and Keith Clark (a Division of Cullman Ventures, Inc.).

i. "ROD" or "Record of Decision" shall mean any Record(s) of Decision for the Sidney Landfill Superfund Site, issued by EPA pursuant to the NCP in order to select a remedial action to be implemented at the Site.

j. "Section" shall mean a portion of this Consent Order identified by a Roman numeral.

k. "Site" shall mean the Sidney Landfill Superfund Site, located on the east side of Richardson Hill Road in the Towns of Masonville and Sidney, Delaware County, New York, which is depicted generally on the map attached as Appendix 1.

l. "State" shall mean the State of New York and its agencies, departments and instrumentalities.

m. "United States" shall mean the United States of America, its agencies, departments, and instrumentalities.

n. "Waste Material" shall mean (1) any "hazardous substance" under Section 101(14) of CERCLA, 42 U.S.C. § 9601(14); and (2) any pollutant or contaminant under Section 101(33) of CERCLA, 42 U.S.C. § 9601(33).

IV. EPA'S FINDINGS OF FACT

7. The Site is located on the east side of Richardson Hill Road at the boundary between the Towns of Masonville and Sidney, Delaware County, New York.

8. The Site was used for waste disposal from approximately December 1, 1967 to approximately October 31, 1972. Industrial, commercial and municipal wastes were disposed of at the Site.

9. Based upon a study conducted by the New York State Department of Environmental Conservation ("NYSDEC") from 1985 to

1987, it was determined that the Site was contaminated with hazardous substances.

10. Pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, EPA placed the Site on the National Priorities List, set forth at 40 C.F.R. Part 300, Appendix B, by publication in the Federal Register on March 30, 1989.

11. EPA is completing a Remedial Investigation and Feasibility Study ("RI/FS") of the Site to determine the nature and extent of contamination at and emanating from the Site and to evaluate remedial alternatives. Upon the completion of the RI/FS, EPA will select a remedy for the Site, which will be documented in a Record of Decision ("ROD"). EPA expects the ROD to be issued in approximately September 1995.

12. EPA has incurred and will continue to incur response costs at or in connection with the Site. As of May 31, 1995, EPA had incurred approximately \$1,916,426 in response costs in connection with the Site.

13. Information currently known to EPA indicates that Ellinwood and Keith Clark each arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of a hazardous substance(s) owned or possessed by such Respondent which was disposed of at the Site.

14. Information currently known to EPA also indicates that A & P accepted a hazardous substance(s) for transport to the Site.

15. In accordance with Section 122(g) of CERCLA, 42 U.S.C. § 9622(g), information currently known to EPA indicates that the amount of hazardous substances contributed to the Site by each Respondent does not exceed 1.0% of the hazardous substances at the Site, and that the toxic or other hazardous effects of the hazardous substances contributed by each Respondent to the Site do not contribute disproportionately to the cumulative toxic or other hazardous effects of the hazardous substances at the Site. Based upon all of the information known to EPA, the estimated volume of the hazardous substances contributed to the Site by each Respondent is set forth in Appendix 2 which is incorporated herein by reference.

16. In evaluating the settlement embodied in this Consent Order, EPA has considered the potential costs of remediating contamination at or in connection with the Site, taking into account possible cost overruns in completing the remedial action selected in the ROD and possible future costs if the remedial action selected by EPA proves not to be protective of public health or the environment.

17. Payments required to be made by each Respondent pursuant to this Consent Order, as reflected in Paragraph 20 hereof, each are a minor portion of the total response costs at the Site which, based on currently available information, EPA estimates to be \$15,111,426.

V. DETERMINATIONS BY EPA

18. Based upon the Findings of Fact set forth above and on the administrative record for this Site, EPA has determined that:

a. the Site is a "facility," as that term is defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9);

b. each Respondent is a "person," as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21);

c. each Respondent is a "potentially responsible party" within the meaning of Sections 107(a) and 122(g) (1) of CERCLA, 42 U.S.C. §§ 9607(a) and 9622(g) (1);

d. there has been an actual or threatened "release" of a hazardous substance from the Site, as that term is defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22);

e. prompt settlement with the Respondents is practicable and in the public interest within the meaning of Section 122(g) (1) of CERCLA, 42 U.S.C. § 9622(g) (1);

f. each Respondent's payment to be made under this Consent Order represents only a minor portion of the total response costs at the Site, pursuant to Section 122(g) (1) of CERCLA, 42 U.S.C. § 9622(g) (1); and

g. the amount of hazardous substances contributed to the Site by each Respondent and the toxic or other hazardous effects of the hazardous substances contributed to the Site by each Respondent are minimal in comparison to other hazardous substances at the Site, pursuant to Section 122(g) (1) (A) of CERCLA, 42 U.S.C. § 9622(g) (1) (A).

VI. ORDER

19. Based upon the administrative record for this Site and the Findings of Fact and Determinations set forth above, and in consideration of the promises and covenants set forth herein, and intending to be legally bound, EPA and Respondents agree, and EPA hereby orders, as follows.

VII. PAYMENTS BY RESPONDENTS

20. a. Within thirty (30) days of the effective date of this Consent Order, each Respondent shall remit to EPA the amount set forth in Paragraph 20.b. for such Respondent, by certified or cashier's check made payable to "EPA Hazardous Substance Superfund." Each check shall reference the Site name, the name and address of Respondent, and the EPA Index Number of this Consent Order (II-CERCLA-95-0215), and shall be sent to the following address:

EPA Region II
Attn: Superfund Accounting
P.O. Box 360188M
Pittsburgh, Pennsylvania 15251

b. The amount to be paid by each Respondent pursuant to this Consent Order is as follows:

<u>Respondent</u>	<u>Amount</u>
Ellinwood Auto Parts, Inc.	\$1,024.69
A & P Disposal Service, Inc.	\$1,024.69
Keith Clark	\$7,331.37

c. The amount to be paid by each Respondent under this Consent Order includes a premium to take into account

possible cost overruns in completing the remedial action selected in the ROD and possible future response costs if the remedial action selected by EPA with respect to the Site proves not to be protective of public health or the environment.

21. Each Respondent shall simultaneously send a copy of its check to:

Farah Khakee
Assistant Regional Counsel
Office of Regional Counsel
United States Environmental Protection Agency, Region II
290 Broadway, 17th Floor
New York, NY 10007-1866

Richard Ramon, Remedial Project Manager
New York/Caribbean Superfund Branch I
Emergency and Remedial Response Division
U. S. Environmental Protection Agency, Region II
290 Broadway, 20th Floor
New York, NY 10007-1866

VIII. CIVIL PENALTIES

22. In addition to any other remedies or sanctions available to EPA, any Respondent who fails or refuses to comply with any term or condition of this Consent Order shall be subject to a civil penalty in accordance with Section 109 of CERCLA, 42 U.S.C. § 9609.

IX. CERTIFICATION OF RESPONDENTS

23. By signing this Consent Order, each Respondent certifies to the best of its knowledge and belief, the following:

a. Respondent has provided to EPA all information in its possession, or in the possession of its officers, directors, employees, contractors, agents, or assigns, that

relates in any way to the generation, treatment, transportation, storage, or disposal of any Waste Material(s) at or in connection with the Site;

b. Respondent has had the opportunity to review information made available by EPA;

c. Respondent is not aware of any facts which would indicate that the information contained in the documentation identified in Paragraph 23.a. is inaccurate with respect to the amount of Waste Material(s) that Respondent may have transported to or arranged to be disposed of at the Site, with respect to the chemical nature and constituents of such Waste Material(s), or with respect to the toxic or other hazardous effects of such Waste Material(s), if any; and

d. with respect to the totality of the information provided to EPA by Respondent as described in Paragraph 23.a., in combination with any information provided to Respondent by EPA describing Respondent's alleged involvement related to the Site, Respondent neither possesses nor knows of other documents or information that would suggest:

i. that the Respondent has shipped a higher volume of Waste Material(s) to the Site than is indicated by this information; or

ii. that Respondent has shipped Waste Material(s) to the Site possessing different chemical natures or constituents or possessing more toxic or other

hazardous effects than are indicated by this information.

X. COVENANT NOT TO SUE BY UNITED STATES

24. In consideration of the payments that will be made by Respondents pursuant to Section VII of this Consent Order, and except as specifically provided in Paragraphs 25 through 27 of this Consent Order, the United States covenants not to sue or to take any other civil or administrative action against the Respondents pursuant to Sections 106 and 107(a) of CERCLA, 42 U.S.C. §§ 9606, 9607(a), relating to the Site. This covenant not to sue shall take effect, as to each Respondent, upon receipt by EPA of the respective payment required of the Respondent by Section VII above. With respect to each Respondent, individually, this covenant not to sue is conditioned upon the complete satisfaction by Respondent of its payment obligations under this Consent Order. This covenant not to sue extends only to Respondents and does not extend to any other person.

Reservation of Rights

25. The covenant not to sue set forth above does not pertain to any matters other than those expressly specified in Paragraph 24. The United States reserves, and this Consent Order is without prejudice to, all rights against Respondents with respect to all other matters, including the following:

- a. claims based on a failure to make the payments required by Section VII of this Consent Order;

b. liability arising from the past, present, or future disposal, release, or threat of release of hazardous substances unrelated to this Site;

c. liability arising out of future disposal by any Respondent of any hazardous substance at the Site;

d. liability for damages for injury to, destruction of, or loss of natural resources, including the reasonable cost of assessing such injury, destruction, or loss;

e. liability for response costs that have been or may be incurred by the U.S. Department of the Interior, the National Oceanic and Atmospheric Administration, or any other federal trustees for natural resources relating to the Site;

f. criminal liability; and

g. liability for violations of federal or state law other than those that are addressed under this Consent Order.

26. Nothing in this Consent Order constitutes a covenant not to sue or a covenant not to take action or otherwise limits the ability of the United States, including EPA, to seek or obtain further relief from any Respondent, and the covenant not to sue in this Consent Order is null and void, if information unknown to EPA as of the date of the execution of this Consent Order by EPA is discovered that indicates that such Respondent no longer qualifies as a de minimis party at the Site because such party contributed greater than 1.0% of the hazardous substances

at the Site or contributed hazardous substances which are significantly more toxic or of significantly greater hazardous effect than other hazardous substances at the Site.

27. Nothing in this Consent Order is intended as a release or covenant not to sue for any entity not a signatory to this Consent Order, and the United States expressly reserves its rights to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which the United States, including EPA, may have against any person, firm, corporation, or other entity not a signatory to this Consent Order. Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a party to this Consent Order.

XI. COVENANTS BY RESPONDENTS

28. In consideration of the United States' covenant not to sue in Section X, Respondents covenant not to sue and agree not to assert any claims or causes of action against the United States, its agencies, officers, representatives, contractors, or employees, with respect to the Site or this Consent Order including (a) any direct or indirect claim for reimbursement from the Hazardous Substance Superfund (established pursuant to the Internal Revenue Code, 26 U.S.C. § 9507), through Sections 106(b)(2), 111, or 112 of CERCLA, 42 U.S.C. §§ 9606(b)(2), 9611, or 9612, or any other provision of law; and (b) any claim under Sections 107 or 113 of CERCLA, 42 U.S.C. §§ 9607, 9613, related

to the Site. If pursuant to Paragraph 26 above, the United States' covenant not to sue as to a Respondent becomes null and void due to the discovery of information of the type referred to in Paragraph 26 above, then that Respondent's covenant not to sue pursuant to this Paragraph shall be null and void.

XII. CONTRIBUTION PROTECTION

29. With regard to claims for contribution against Respondents, the Parties hereto agree that each Respondent is entitled to protection from contribution actions or claims as provided by Sections 113(f)(2) and 122(g)(5) of CERCLA, 42 U.S.C. §§ 9613(f)(2), 9622(g)(5), for matters addressed in this Consent Order. The matters addressed in this Consent Order, for purposes of the preceding sentence, are any and all civil liability for reimbursement of or contribution towards response costs incurred by EPA or any other person (not including any federal trustees for natural resources) in connection with the Site, and for injunctive relief, pursuant to Sections 106 or 107(a) of CERCLA, 42 U.S.C. §§ 9606, 9607(a), with regard to the Site. Such contribution protection with respect to each Respondent is conditional upon that Respondent's compliance with the requirements of this Consent Order.

XIII. CLAIMS AGAINST THE FUND

30. Nothing in this Consent Order shall be deemed to constitute preauthorization of a CERCLA claim within the meaning

of Sections 111 or 112 of CERCLA, 42 U.S.C. §§ 9611 or 9612, or 40 C.F.R. § 300.700(d).

XIV. OPPORTUNITY FOR PUBLIC COMMENT

31. This de minimis Consent Order shall be subject to a 30-day public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i). The United States may withdraw its consent to this Consent Order if comments received disclose facts or considerations that indicate that this Consent Order is inappropriate, improper, or inadequate.

XV. ATTORNEY GENERAL APPROVAL

32. This Consent Order shall be deemed to be issued upon the approval of the settlement embodied in this Consent Order by the Attorney General or her designee, pursuant to Section 122(g)(4) of CERCLA, 42 U.S.C. § 9622(g)(4).

XVI. EFFECTIVE DATE

33. The effective date of this Consent Order shall be the date upon which EPA issues written notice to Respondents that the public comment period pursuant to Paragraph 31, above, has closed and that comments received, if any, do not require EPA to modify or withdraw from this Consent Order.

IT IS SO AGREED AND ORDERED:

U.S. Environmental Protection Agency

By:

Willie F. Fox
Jeanne M. Fox
Regional Administrator
U.S. Environmental Protection Agency
Region II

9/27/95
Date

CONSENT

The Respondent identified below has had an opportunity to confer with EPA regarding this Consent Order. The Respondent hereby consents to the issuance of this Consent Order and to its terms. The individual executing this Consent Order on behalf of the Respondent certifies under penalty of perjury under the laws of the United States and of the State of the Respondent's incorporation that he or she is fully and legally authorized to agree to the terms and conditions of this Consent Order and to bind the Respondent thereto.

A&P DISPOSAL SERVICE, INC.
NAME OF RESPONDENT

09/21/95
Date

Alton DeForest
(signature)

Alton DeForest
(typed name of signatory)

President
(title of signatory)

CONSENT

The Respondent identified below has had an opportunity to confer with EPA regarding this Consent Order. The Respondent hereby consents to the issuance of this Consent Order and to its terms. The individual executing this Consent Order on behalf of the Respondent certifies under penalty of perjury under the laws of the United States and of the State of the Respondent's incorporation that he or she is fully and legally authorized to agree to the terms and conditions of this Consent Order and to bind the Respondent thereto.

ELLINWOOD Auto Parts, Inc

NAME OF RESPONDENT

Sept 22, 1995
Date

Robert C. Raynor
(signature)

Robert C. Raynor
(typed name of signatory)

President
(title of signatory)

CONSENT

The Respondent identified below has had an opportunity to confer with EPA regarding this Consent Order. The Respondent hereby consents to the issuance of this Consent Order and to its terms. The individual executing this Consent Order on behalf of the Respondent certifies under penalty of perjury under the laws of the United States and of the State of the Respondent's incorporation that he or she is fully and legally authorized to agree to the terms and conditions of this Consent Order and to bind the Respondent thereto.

Keith Clark (a Division of Cullman
Ventures, Inc.)

NAME OF RESPONDENT

September 22, 1995

Date


(signature)

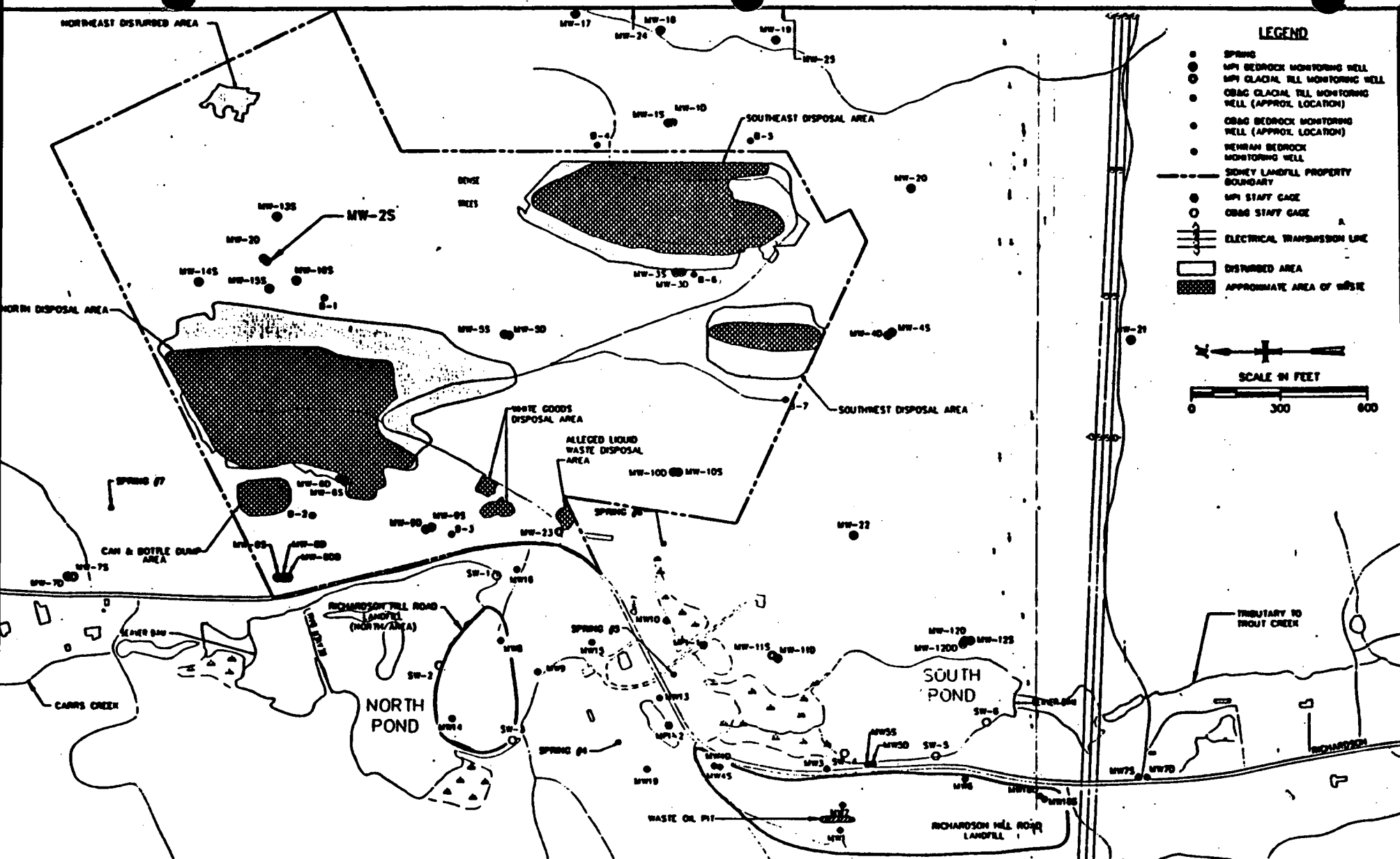
Fred J. Riordan

(typed name of signatory)

Director of Manufacturing

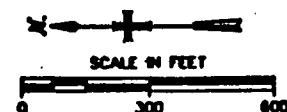
(title of signatory)

APPENDIX 1



LEGEND

- SPRING
- MPI BEDROCK MONITORING WELL
- MPI CLACIAL TILL MONITORING WELL
- CBAG CLACIAL TILL MONITORING WELL (APPROX. LOCATION)
- CBAG BEDROCK MONITORING WELL (APPROX. LOCATION)
- WEHMAN BEDROCK MONITORING WELL
- SIDNEY LANDFILL PROPERTY BOUNDARY
- MPI STAFF CAGE
- CBAG STAFF CAGE
- ELECTRICAL TRANSMISSION LINE
- ▭ DISTURBED AREA
- ▨ APPROXIMATE AREA OF WASTE



MALCOLM
PIRNIE

SIDNEY LANDFILL
SIDNEY, NEW YORK
SITE PLAN

COPYRIGHT © 1993
MALCOLM PIRNIE, INC.

APPENDIX 2

EPA's FINDINGS REGARDING WASTE CONTRIBUTIONS BY DE MINIMIS PARTIES, SIDNEY LANDFILL SITE

<u>Waste Contributor</u>	<u>Nature of hazardous substance- containing waste sent to Sidney Landfill Site</u>	<u>Volume</u>
Ellinwood Auto Parts, Inc.	paint waste	4 gallons
A & P Disposal Service, Inc.	paint waste	4 gallons
Keith Clark (a Division of Cullman Ventures, Inc.)	ink and paint waste	28.5 gallons

The total volume of hazardous substance-containing waste disposed of at the Sidney Landfill Site is estimated to be at least 110,231.3 gallons. The respective volumetric percentages of the de minimis PRPs are as follows:

Ellinwood Auto Parts, Inc.: .00362%

A & P Disposal Service, Inc.: .00362%

Keith Clark: .0259%



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

VIA CERTIFIED MAIL --
RETURN RECEIPT REQUESTED

March 6, 1996

Louis DeStefano, Esq.
Carpenter, Bennett & Morrissey
Three Gateway Center
100 Mulberry Street
Newark, NJ 07102-4082

Paul J. Sweeney, Esq.
Coughlin & Gerhart
One Marine Midland Plaza
P.O. Box 2039
Binghamton, NY 13902-2039

Robert C. Raynor, President and Chairman
Ellinwood Auto Parts, Inc.
21 Cartwright Avenue
Sidney, NY 13838

Re: A & P Disposal Service, Inc.; Keith Clark (a Division of
Cullman Ventures, Inc.); Ellinwood Auto Parts, Inc.

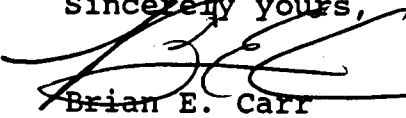
Sidney Landfill Superfund Site, Towns of Masonville and
Sidney, Delaware County, New York, Administrative Order on
Consent Index No. II CERCLA-95-0215

Dear Sirs:

The public comment period on the above-referenced settlement agreement (the "Agreement") has closed. EPA received no comments on the Agreement. Accordingly, consistent with paragraph 33 of the Agreement, the effective date of the Agreement is today, March 6, 1996. A copy of the Agreement is enclosed.

Thanks for your cooperation in this matter. If you have any questions, please feel free to contact me at (212) 637-3170.

Sincerely yours,


Brian E. Carr
Assistant Regional Counsel
New York/Caribbean Superfund Branch
Office of Regional Counsel



U. S. Department of Justice

Environment and Natural Resources Division

Fox
Muszynski
cc: Muegan/Action
Callahan

90-11-2-1120

Office of the Assistant Attorney General

Washington, D.C. 20530

November 1, 1995

Jeanne M. Fox
Regional Administrator
United States Environmental Protection
Agency - Region II
290 Broadway
New York, NY 10007-1866

Re: Sidney Landfill Superfund Site

Dear Ms. Fox:

This is to inform you that on behalf of the Attorney General of the United States and pursuant to Section 122(g)(4) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9622(g)(4), I approved in writing on this date the enclosed Administrative Order on Consent for recovery of response costs from Ellinwood Auto Parts, Inc., A & P Disposal Service, Inc., and Keith Clark, as de minimis settlements with respect to the Sidney Landfill Superfund Site in the Towns of Masonville and Sidney, New York.

Sincerely,

Lois J. Schiffer
Assistant Attorney General
Environment and Natural Resources
Division

Enclosure

8123

NOV 2 1995

11/1/95

